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December 21, 2006

Mail Stop Appeal Brief - Patents
Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

Re: **Application Serial No.:** 10/648,936
Appellants: **Steinmetz, et al.**
Filing Date: **August 27, 2003**
Confirmation No.: **5940**
Title: **AUTOMATED BANKING MACHINE CONFIGURATION SYSTEM AND METHOD**
Docket No.: **D-1150 DIV**

Sir:

Please find enclosed the Appellants' Reply Brief pursuant to 37 C.F.R. § 41.41 for filing in the above-referenced application.

Very truly yours,

Ralph E. Jocke, Reg. No. 31,029

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Ralph E. Jocke

D-1150 DIV

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In Re Application of:	)	
Richard A. Steinmetz, et al.	)	
	)	Art Unit
Serial No.: **10/648,936**	)	**3624**
	)	
Confirm. No.: **5940**	)	
	)	
Filed: **August 27, 2003**	)	Patent Examiner
	)	**Lalita M. Hamilton**
For: **Automated Banking Machine**	)	
Configuration System and Method	)	

Mail Stop Appeal Brief - Patents
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Alexandria, VA 22313-1450

REPLY BRIEF PURSUANT TO 37 C.F.R. § 41.41

Sir:

The Appellants hereby submit their Reply Brief pursuant to 37 C.F.R. § 41.41 concerning

the above-referenced Application. The Reply Brief is in response to the Examiner's Answer

("Answer") dated November 3, 2006.

STATUS OF CLAIMS

Claims 13-24 and 28-34 are pending in the Application.

Claims rejected: 13-24 and 28-34

Claims allowed: none

Claims confirmed: none

Claims withdrawn: none

Claims objected to: none

Claims canceled: 1-12 and 25-27

Appellants appeal the rejections of claims 13-24 and 28-34. These claim rejections were the only claim rejections present in the Office Action ("Action") dated April 24, 2006, which re-opened prosecution after Appellants' first appeal to the Board. Claims 13-24 and 28-34 have been rejected at least twice.

GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The grounds to be reviewed in this appeal are:

Whether Appellants' claims 13-24 and 28-34 are anticipated under 35 U.S.C. § 102(e) by

Dulude, et al., U.S. Patent No. 6,310,966 ("Dulude").

ARGUMENT

The Answer includes a "**(9) Grounds of Rejection**" section beginning on page 2. All of the grounds of rejection included in this section of the Answer appear to be substantially identical to those previously presented in the Office Action dated April 24, 2006.

Appellants respectfully submit that these rejections have been addressed in Appellants' Supplemental Appeal Brief dated July 20, 2006, and Appellants have shown that all rejections should be reversed. Therefore please refer to Appellants' previous arguments in the Supplemental Appeal Brief regarding all the issues of record. Appellants' Supplemental Appeal Brief is incorporated by reference herein.

The following arguments specifically reply to assertions made in the Answer. However, even though the present Reply Brief has been organized in a manner which addresses issues and arguments as presented in the Answer, Appellants do not waive their right to have all of their claims, each of which was separately argued in the Appeal Brief, considered independently of each other by the Board. If the Board has an unwritten policy which considers the format of the present Reply Brief to be a waiver of Appellants' right to have each separately argued claim in the Appeal Brief be independently considered by the Board, then Appellants respectfully request that the Board so notify Appellants and provide an opportunity for Appellants to submit a revised Reply Brief.

Response to Arguments in Examiner's Answer

Beginning at the bottom of page 6 of the Examiner's Answer, there is a section labeled "**(10) Response to Arguments**" which presents additional arguments in response to Appellants'

Appeal Brief. Appellants respectfully submit that these additional arguments do not overcome the numerous deficiencies in the rejections pointed out in Appellants' Appeal Brief. The Examiner has again failed to establish that each of the recited elements, features, relationships, and steps pointed out in the Appeal Brief as missing in the applied art, can be found in the prior art. The Examiner has not established anticipation or *prima facie* obviousness based on the applied art. Therefore it is respectfully submitted that all of the rejections of claims 13-24 and 28-34 should be reversed.

Claim 13

With respect to independent claim 13, the Answer does not show where Dulude teaches or suggests step (b) of claim 13. The portions of Dulude referenced in the Action with respect to step (b) (e.g., Column 4, lines 10-25; and Column 5, lines 33-50) at best only show that an ATM may access a memory (66) of a smart card to obtain a biometric certificate of a first user (Column 5, lines 45-50). Although such a certificate may include a digital signature (22), nowhere does Dulude disclose or suggest that an ATM or an automated banking machine authenticate this digital signature.

Further, authentication of this digital signature by an ATM would also not be inherent in Dulude. Anticipation by inherency requires that the Patent Office establish that persons skilled in the art would recognize that the missing element is *necessarily present* in the reference. To establish inherency, the Office must prove through citation to prior art that the feature alleged to be inherent is "necessarily present" in a cited reference. Inherency may not be established based on probabilities or possibilities. It is plainly improper to reject a claim on the basis of 35 U.S.C.

§102 based merely on the possibility that a particular prior art disclosure could or might be used or operated in the manner recited in the claim. *In re Robertson*, 169 F.3d 743, 49 U.S.P.Q.2d 1949 (Fed. Cir. 1999).

The described method in which biometric certificates are used in Dulude, does not require an ATM to authenticate a digital signature. In Dulude, a transaction system (40) (Figure 4) may be used to acquire transaction biometric data (46) from a first user, and generate transaction first data (50). Such transaction first data may be an electronic funds transfer through an ATM (Column 5, lines 50-62). A digital signature function (54) is then used to generate (not authenticate) a digital signature (58) from a hash of the transaction's first data and the biometric data. (Column 6, lines 1-17). This digital signature (58) is then sent to a network (60), where it is received by a receiving section (42) (Figure 5; Column 6, lines 28-30).

Authentication of the digital signature (58) and authentication of the user through use of biometric data is carried out by the receiving station (Column 6, line 28 to Column 8, lines 7). This process does not require the ATM to authenticate a digital signature on the biometric certificate. Thus it is not inherent in Dulude for an ATM to authenticate a digital signature of a certificate.

It follows that nowhere does Dulude disclose or suggest Appellants' recited step (b) of authenticating at least one digital signature associated with a certificate through operation of the banking machine. Dulude does not explicitly or inherently teach Appellants' step (b) of claim 13.

In addition, the Answer also does not show where Dulude teaches or suggests Appellants' step (c) of claim 13. With respect to step (c) the Answer at page 7, lines 12-17, merely restates that Column 4, lines 10-25, and Column 5, lines 33-50, of Dulude shows step (b) (which it does

not). Nowhere does the Answer even attempt to refute the arguments made in the Appeal Brief that there is a lack of any teaching or disclosure in Dulude directed to configuring an ATM. Authentication of a certificate (even if performed by an ATM) does not disclose or suggest configuring an ATM responsive to the certificate.

In Dulude, authentication of a transaction is carried out by comparing the physical (biometric) characteristics of a user initiating the transaction against pre-stored biometric data in a biometric certificate (Column 3, lines 30-50). Dulude does not disclose or suggest using certificates to configure an automated banking machine. Further, nowhere does Dulude disclose or suggest that any feature or data in its biometric certificates is capable of being used to configure an automated banking machine.

In addition, claim 13 specifically recites configuring the banking machine responsive to the certificate <u>and</u> authentication of the at least one digital signature associated with the certificate. Nowhere does Dulude disclose or suggest configuring an automated banking machine responsive to <u>both</u> a digital certificate and authentication of a digital signature associated with the certificate.

Further, even if the Office regards the act of authenticating a transaction at a remote receiving station as some form of configuration of an ATM (which it isn't), the authentication described in Dulude still does not disclose or suggest Appellants' step (b) which explicitly recites authenticating at least one digital signature associated with the certificate through operation of the banking machine. In addition, the authentication described in Dulude also does not disclose or suggest Appellants' step (c) which explicitly recites configuring the banking machine responsive to both **the certificate and machine's authentication of the at least one digital signature** in step (b).

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Thus, Dulude does not disclose or suggest configuring an automated banking machine responsive to both a **certificate and authentication of at least one digital signature** associated with the certificate, as specifically recited in step (c) of claim 13.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 13 is respectfully requested.

Claim 14

With respect to the additional recited features of claim 14, the Answer references column 5, lines 33-50, of Dulude, which indicate that the ATM of Dulude may access a memory (66) of a smart card to obtain a biometric certificate. In addition, the Answer references column 4, lines 4-25 and lines 55-65, of Dulude which discuss generation of a biometric certificate (38) using a private key of a certificate authority. However, this does not change the fact that Dulude fails to teach Appellants' recited feature of authenticating through operation of a banking machine, at least one digital signature responsive to a public key of a licensing authority.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 14 is respectfully requested.

Claim 15

With respect to the additional recited features of claim 15, the Answer references column 4, lines 10-25, and column 5, lines 33-50, of Dulude. As discussed previously, these portions of Dulude teach an ATM that may access a memory (66) of a smart card to obtain a digitally signed biometric certificate. However these portions of Dulude do not disclose or suggest that Dulude's

biometric certificate, or any other certificate, corresponds to at least one software component authorized to be installed on the banking machine as explicitly recited in claim 15. Further, nowhere does Dulude disclose or suggest Appellants' recited step of installing the at least one software component on the banking machine, which at least one software component corresponds to a digital certificate.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 15 is respectfully requested.

Claim 16

With respect to claim 16, the Answer references Dulude column 5, lines 40-50. As discussed previously, this portion of Dulude indicates that the ATM of Dulude may access a memory (66) of a smart card to obtain a biometric certificate of a first user. However, nowhere does this portion of Dulude or any other portion of Dulude, disclose or suggest Appellants' recited feature of a certificate which includes a plurality of sets of configuration rules. Further, nowhere does Dulude disclose or suggest, as specifically recited in Appellants' claim 16, that each set of configuration rules corresponds to at least one of a plurality of automated banking machines. In addition, nowhere does Dulude disclose or suggest that an automated banking machine is enabled to be configured responsive to at least one set of the configuration rules included in a digital certificate, as recited by Appellants.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 16 is respectfully requested.

Claim 17

With respect to the additionally recited features of claim 17, the Answer additionally relies on column 1, line 65, to column 2, line 13 of Dulude as the asserted basis for rejection. This portion of Dulude indicates that authenticating certificates may be generated by concatenating a message and a public key with a set of data which may include an expiration of validity of the certificate. However, nowhere does this portion or any other portion of Dulude disclose or suggest Appellants' recited step (d) of determining, through operation of an automated banking machine responsive to the expiration parameter in a certificate, that configuration of the software on the machine is not authorized. Further, nowhere does Dulude disclose or suggest Appellants' recited step (e) of preventing configuration of software on the banking machine. In addition, nowhere does Dulude disclose or suggest preventing configuration of software on the banking machine responsive to the determination that configuration of software on the machine is not authorized, as explicitly recited in the claim.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 17 is respectfully requested.

Claim 18

With respect to the additionally recited features of claim 18, the Answer relies on column 1, line 65, to column 2, line 15, of Dulude. This portion of Dulude indicates that authenticating certificates may be generated by concatenating a message and a public key, with a set of data which may include an issuer unique ID number and a subject unique ID number (12).

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The subject unique ID number is described in Dulude as corresponding to a Social Security number or a password associated with the user sending the transaction. Nowhere does Dulude disclose or suggest that such IDs correspond to an identification value unique to the banking machine as specifically recited in Appellants' claim 18. Dulude does not disclose or suggest Appellants' recited feature of a certificate that includes an identification value unique to the particular banking machine.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 18 is respectfully requested.

Claim 19

With respect to the additional features recited in claim 19, the Answer relies on column 1, line 65, to column 2, line 15, of Dulude as the basis for rejection. However, nowhere does this portion or any other portion of Dulude disclose or suggest, as Appellants explicitly recite in claim 19, an identification value included in a certificate, which identification value corresponds to a hardware embedded identification value in the banking machine. Nowhere does Dulude disclose or suggest Appellants' recited step of determining through operation of a banking machine, that an identification value included in a certificate corresponds to a hardware embedded identification value in the banking machine.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 19 is therefore respectfully requested.

Claim 20

With respect to the additional features recited in claim 20, the Answer again relies on column 1, line 65, to column 2, line 15 of Dulude. However, nowhere does this portion or any other portion of Dulude disclose or suggest Appellants' recited feature of a certificate which includes a terminal identification value. Further, nowhere does Dulude disclose or suggest Appellants' specifically recited step of configuring an automated banking machine responsive to the certificate, including the step of associating the banking machine with the terminal identification value.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 20 is respectfully requested.

Claim 21

With respect to the additional features recited in claim 21, the Answer again relies on the same column 1, line 65, to column 2, line 15 of Dulude as the basis for rejection. However nowhere does this portion or any other portion of Dulude disclose or suggest Appellants' recited step (d) of determining that a terminal identification value associated with an automated banking machine has changed. Further, nowhere does Dulude disclose or suggest Appellants' recited step (e) of preventing the machine from performing at least one transaction function responsive to the determination that the terminal identification value has changed.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 21 is respectfully requested.

Claim 22

With respect to the additional features recited in Appellants' claim 22, the Answer relies on column 6, lines 58-65 of Dulude as the basis for rejection. This portion of Dulude indicates that a biometric certificate (68) is retrieved and sent to a biometric certificate extractor (64) to decrypt the biometric certificate (68) using a public key (70) of a certificate authority. However, this portion of Dulude is not pertinent to what is recited in the claim. Nowhere does this portion nor any other portion of Dulude, disclose or suggest retrieving a certificate from a licensing authority through operation of an automated banking machine, as explicitly recited in Appellants' claim 22.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 22 is respectfully requested.

Claim 23

With respect to the additional features recited in Appellants' claim 23, the Answer relies on column 5, lines 40-50, of Dulude. As discussed previously, this portion of Dulude indicates that an ATM of Dulude may access a memory (66) of a smart card to obtain a biometric certificate of a first user. Appellants' claim 23 explicitly recites receiving with the banking machine, a certificate from a server. Nowhere does Dulude disclose or suggest that a smart card is a server, nor can Dulude's smart card operate as a server. Nowhere does Dulude disclose or suggest Appellants' recited step of receiving a certificate from a server in operative connection with the banking machine.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 23 is respectfully requested.

Claim 24

With respect to independent claim 24, the Answer relies on column 4, lines 10-25, and column 5, lines 33-50, of Dulude to allegedly show the features of Appellants' recited steps (a), (b) and (c) of claim 24. Dulude does not teach the recited method steps. As discussed previously, these portions of Dulude at best indicate that an ATM of Dulude may access a memory (66) of a smart card to obtain a digitally signed biometric certificate. Although such a certificate may include a digital signature (22), nowhere does Dulude disclose or suggest as explicitly recited in Appellants' claim, that an automated banking machine authenticate such a digital signature. Nor does Dulude disclose or suggest configuring an automated banking machine responsive to a certificate and a banking machine authenticated digital signature, as explicitly recited in the claim.

Dulude is directed to a system that authenticates transactions using biometric certificates. In Dulude, authentication of a transaction is carried out by comparing the physical (biometric) characteristics of a user initiating the transaction, against pre-stored biometric data in a biometric certificate (Column 3, lines 30-50). Dulude does not disclose or suggest using certificates to configure an automated banking machine. Nowhere does Dulude disclose or suggest any feature or data in its biometric certificates that is capable of being used to configure an automated banking machine. Nowhere does Dulude disclose or suggest an automated banking machine that

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authenticates a digital signature associated with the certificate through operation of the banking machine.

Claim 24 specifically recites configuring the banking machine responsive to the certificate <u>and</u> authentication of the at least one digital signature associated with the certificate. Nowhere does Dulude disclose or suggest configuring an automated banking machine responsive to <u>both</u> a digital certificate and authentication by the machine of a digital signature associated with the certificate.

Further, even if the Office regards the act of authenticating a transaction at a remote receiving station as some form of configuration of an ATM (which it is not), the authentication described in Dulude still does not disclose or suggest Appellants' step (b) of authenticating at least one digital signature associated with the certificate through operation of the banking machine. In addition, the authentication described in Dulude does not disclose or suggest Appellants' step (c) of configuring an automated banking machine responsive to <u>both</u> a **certificate and the machine's authentication of at least one digital signature associated with the certificate in step (b)**.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in Appellants' claim. Reversal of the rejection of claim 24 is respectfully requested.

Claim 28

With respect to Appellants' independent method claim 28, the Answer relies on column 2, lines 1-10, and column 5, lines 33-50, of Dulude as the basis for the rejection. The Answer asserts that these portions of Dulude explicitly teach all the features and relationships recited in

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steps (a), (b) and (c) of claim 24. Appellants disagree. As discussed previously, column 5, lines 33-50 indicate that an ATM of Dulude may access a memory (66) of a smart card to obtain a biometric certificate. However, as also discussed previously, nowhere does Dulude disclose or suggest configuring an automated banking machine responsive to Dulude's biometric certificate or any other certificate.

Column 2, lines 1-10, of Dulude teaches that a certificate of Dulude may include a serial number for the particular certificate with respect to a sequence of generated certificates. However, nowhere does Dulude disclose or suggest that a serial number or any other data included in a certificate, corresponds to a serial number associated with an ATM hardware device as specifically recited in Appellants' step (b). Also, nowhere does Dulude disclose or suggest, at least one serial number in a certificate associated with at least one hardware device of the ATM as recited by Appellants. Thus Dulude does not disclose or suggest the features of Appellants' recited step (b) of verifying through operation of the at least one processor of the ATM that the at least one serial number included in the at least one certificate corresponds to at least one serial number associated with at least one hardware device of the ATM.

In addition, claim 28 explicitly recites, responsive to this verifying step (b), the step of configuring the ATM through operation of the at least one processor in the ATM, responsive to the at least one digital certificate. Nowhere does Dulude disclose or suggest the elements of Appellants' step (c) of **configuring the ATM responsive to the at least one digital certificate.** In addition, Dulude does not disclose or suggest configuring the ATM **through operation of the at least one processor** in the ATM responsive to the at least one digital certificate as explicitly recited in step (c). Further, nowhere does Dulude disclose or suggest as Appellants specifically

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recite, configuring the ATM responsive to a digital certificate and responsive to a step of verifying that a serial number included in the at least one certificate corresponds a serial number associated with at least one hardware device of the ATM.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in Appellants' claim. Reversal of the rejection of claim 28 is respectfully requested.

Claim 29

With respect to the additional features recited in Appellants' claim 29, the Answer relies on Column 4, lines 10-25 and 55-65 of Dulude as the basis for rejection. This portion of Dulude discusses generation of a biometric certificate (38) using a private key of a certificate authority. In addition, the Answer relies on Column 5, lines 33-50, of Dulude, which discusses that an ATM of Dulude may access a memory (66) of a smart card to obtain a biometric certificate. However, the Answer has failed to show where Dulude teaches or suggests Appellants' recited step (d) of authenticating the at least one digital signature included in a certificate through operation of at least one processor in an ATM. Indeed Dulude includes no such teaching.

In addition, nowhere does Dulude disclose or suggest Appellants' recited feature that step (c) is carried out responsive to steps (b) and (d). Nowhere does Dulude disclose or suggest configuring an ATM responsive to both: authenticating the at least one digital signature included in the certificate; and verifying that at least one serial number included in the certificate corresponds a serial number associated with an ATM hardware device.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 29 is respectfully requested.

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Claim 30

With respect to the additional features recited in Appellants' claim 30, the Answer points to column 5, lines 33-50, of Dulude as the basis for rejection. As discussed previously, this portion of Dulude indicates that an ATM of Dulude may access a memory (66) of a smart card to obtain a biometric certificate of a first user. However, claim 30 recites a server. Nowhere does Dulude disclose or suggest that a smart card is a server that is in operative connection with the ATM through a network. Nowhere does Dulude disclose or suggest Appellants' recited step of receiving at least one digitally signed certificate through operation of the ATM from a server in operative connection with the ATM through a network

Dulude does not disclose or suggest each of the features, relationships, and steps recited in Appellants' claim. Reversal of the rejection of claim 30 is respectfully requested.

Claim 31

With respect to Appellants' claim 31, the Answer again relies on column 5, lines 33-50 of Dulude. As discussed previously this portion of Dulude indicates that an ATM may access a memory (66) of a smart card to obtain a biometric certificate of a first user.

Nowhere does this portion or any other portion of Dulude disclose or suggest Appellants' additionally recited step of configuring an ATM responsive to a step (b) of verifying that at least one serial number included in a certificate corresponds to a serial number associated with at least one of a keypad, a card reader, the cash dispenser, a printer, a depositor, a CPU, and a network device of an ATM. Dulude has no teachings that correspond to the features explicitly recited in the claim.

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Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 31 is respectfully requested.

Claim 32

With respect to the additional features recited in Appellants' claim 32, the Answer relies on column 1, line 65, to column 2, line 13 of Dulude as the basis for rejection. This portion of Dulude indicates that authenticating certificates may be generated by concatenating a message and a public key with a set of data which may include an expiration of validity of the certificate. However, nowhere does this portion or any other portion of Dulude disclose or suggest the features explicitly recited by Appellants. These features include that: prior to configuring an ATM responsive to a certificate, the ATM is not enabled to perform at least one transaction function involving the operation of the at least one hardware device; and configuring an ATM responsive to the certificate enables the ATM to perform the at least one transaction function involving the operation of the at least one hardware device.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 32 is respectfully requested.

Claim 33

With respect to the additional features recited in claim 33, the Answer additionally relies on column 5, lines 50-62, of Dulude as the basis for rejection. This portion of Dulude indicates that transaction first data may include electronic funds transfers through an ATM. Electronic funds

transfers involve electronic transfers of value between accounts. Such transfers do not disclose or suggest or require use of a cash dispenser, as specifically recited in Appellants' claim 33.

Nowhere does this portion or any other portion of Dulude disclose or suggest that configuring an ATM responsive to a certificate, includes enabling the ATM to dispense cash through operation of a cash dispenser in the ATM as explicitly recited in claim 33.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in the claim. Reversal of the rejection of claim 33 is respectfully requested.

Claim 34

In rejecting the additional features recited in Appellants' claim 34, the Answer relies on column 4, lines 5-12 and 55-65, of Dulude as the basis for the rejection. This portion of Dulude discusses generation of a biometric certificate (38) and use of the certificate to authenticate a first user and associated electronic transactions of the first user. Nowhere does this portion or any other portion of Dulude disclose or suggest Appellants' recited feature of configuring an ATM responsive to at least one key provided in the at least one certificate.

Dulude does not disclose or suggest each of the features, relationships, and steps recited in Appellants' claim. Reversal of the rejection of claim 34 is respectfully requested.

CONCLUSION

Each of Appellants' pending claims specifically recites elements, features, relationships, and steps that are neither disclosed nor suggested in any of the applied prior art. Furthermore, the applied prior art is devoid of any teaching, suggestion, or motivation for producing the recited invention. The single cited reference does not teach all of the elements, features, relationships and steps in the manner recited in Appellants' claims as would be required to sustain the anticipation rejections that have been presented. For these reasons, it is respectfully submitted that all of the rejections should be reversed.

Respectfully submitted,

Ralph E. Jocke   Reg. No. 31,029
231 South Broadway
Medina, Ohio 44256
(330) 721-0000